

# EXHIBIT A

**If You Paid Fees on Your Pre-Paid Debit Card Issued by NUMI and Republic Bank,  
You May Be Eligible for a Payment from a Class Action Settlement.**

*A federal court authorized this notice. This is not a solicitation from a lawyer.*

- A Settlement has been reached in a class action lawsuit about a pre-paid debit card program operated by Stored Value Cards, Inc. d/b/a Numi Financial ("NUMI") and Republic Bank & Trust Company. ("Defendants") for inmates released from correctional facilities. Under the program, inmates released have received the funds in their inmate trust accounts at the time of release on pre-paid debit cards issued by Defendants. The lawsuit, *Amber Humphrey, on behalf of herself and all others similarly situated v. Stored Value Cards, Inc. d.b.a Numi Financial, et al.*, is pending in the United States District Court for the Northern District of Ohio. The lawsuit challenges the placement of inmates' funds on pre-paid debit cards and the fees Defendants charged for use of the cards. Defendants deny any liability and deny that their card program was unlawful. However, to avoid the costs and risks of protracted litigation, Defendants have agreed to a settlement.

- You are a member of the Settlement Class, and you may be eligible for a payment under the Settlement, if you reside in the United States and received a pre-paid debit card issued by Defendants when you were released from a correctional facility.

- Defendants have agreed to contribute Settlement Funds totaling \$550,000 from which payments to members of the Settlement Class will be made. Each Settlement Class member who submits a valid claim form is entitled to a cash payment from which the Settlement Administrator shall deduct any attorney fees and costs, service payment and cost of Notice and Administration approved by the Court.

- Your legal rights are affected whether or not you act. Please read this notice carefully.
- The deadline for filing claims is [claims deadline].

<b>Summary Of Your Legal Rights And Options In This Settlement</b>	
<b>Get A Payment</b>	If you are a Class Member, you may be eligible for a Settlement Payment. Please read this notice carefully to determine how to claim your Settlement Payment. You will receive your Settlement Payment upon submission of a valid claim form online or by requesting a form at the Settlement website, [www.NUMICARDSETTLEMENT.com]. as a deposit on a pre-paid debit card.
<b>Submit a Claim Form</b>	You can view and print a paper claim form at [www.NUMICARDSETTLEMENT.com]. You can also request a claim form by calling [XXX-XXX-XXXX], or by emailing or writing to the Settlement Administrator. You can submit a Claim online at [URL] or by mail.
<b>Exclude Yourself</b>	Exclude yourself from the Settlement. If you exclude yourself from the Settlement, you will receive no benefits from the Settlement. This is the only option that allows you to participate in any other lawsuit against Defendants about the claims in this case. Deadline to opt-out is [DATE].
<b>Object</b>	Write to the Court if you do not like the Settlement. You may object to the Settlement and still receive a Settlement Payment if the Settlement is approved by the Court. Deadline to object is [DATE].
<b>Go to a Hearing</b>	Ask to speak in Court about the fairness of the Settlement.
<b>Do Nothing</b>	You will not receive a payment to which you may be entitled. You will give up your right to participate in further litigation against Defendants about the claims in this case.

- These rights and options, and the deadlines to exercise them, are explained in this notice.
- The Court still has to decide whether to approve the Settlement. If it does, and any appeals are resolved, benefits will be distributed to those who qualify. Please be patient.

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## BASIC INFORMATION

### 1. Why is there a notice?

This is a notice of a proposed Settlement of a class action lawsuit. Judge James Gwin of the United States District Court for the Northern District of Ohio is overseeing the lawsuit. The case is known as *Amber Humphrey, On behalf of herself and all others similarly situated v. Stored Value Cards, Inc. d.b.a Numi Financial, et al*, No. 1:18-cv-1050 (N.D. Ohio). The person who sued, Amber Humphrey, is called the "Plaintiff." Stored Value Cards, Inc. d/b/a Numi Financial ("NUMI") and Republic Bank & Trust Company ("Republic") are the "Defendants".

The Court authorized this notice because you have a right to know about the proposed Settlement and about all of your options before the Court decides whether to give final approval to the Settlement. This notice explains the lawsuit, the Settlement, and your legal rights.

### 2. What is this litigation about?

The lawsuit challenges the placement of inmates' funds on pre-paid debit cards and the fees Defendants charged for use of the cards. The Plaintiff alleges that the fees Defendants charged were excessive and that cardholders did not consent to receive their funds on a pre-paid debit card or to pay fees to Defendants. The amended complaint in the lawsuit is posted on the Settlement website, [www.NUMICARDSETTLEMENT.com](http://www.NUMICARDSETTLEMENT.com).

Defendants deny any liability or wrongdoing but have agreed to settle the case to avoid the costs and risks of litigation.

### 3. Why is this a class action?

In a class action, a person called a "Class Representative" sues on behalf of himself and other people with similar claims. In this case, the Class Representative is the Plaintiff, Amber Humphrey, a former inmate who received a pre-paid debit card. Together, all the people with similar claims (except those who exclude themselves) are members of a "Settlement Class" also called "Settlement Class Members".

### 4. Why is there a Settlement?

While the Court granted Plaintiff's Class Certification, it has not decided in favor of the Plaintiff or Defendants as to the merits of the case. Instead, both sides have agreed to a Settlement. By agreeing to the Settlement, the Parties avoid the costs and uncertainty of a trial, and Settlement Class Members receive the benefits described in this notice. The proposed Settlement does not mean that any law was broken or that Defendants did anything wrong. Defendants deny all legal claims in this case. The Class Representative and her lawyers think the proposed Settlement is best for everyone who is affected.

## WHO IS PART OF THE SETTLEMENT?

If you received notice of the Settlement by a postcard addressed to you, then Defendants' records show that you are a Settlement Class Member. But even if you did not receive a postcard, you may be a Settlement Class Member, as described below.

### 1. Who is included in the Settlement?

You are a member of the Settlement Class if you reside in the United States and received a pre-paid debit card from Defendants upon your release from a correctional facility.

### 2. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are in the Settlement Class, or have any other questions about the Settlement, visit the Settlement website at [URL] or call the toll-free number, [XXX-XXX-XXXX]. You may also send questions to the Settlement Administrator at *Humphrey v. Stored Value Cards* Settlement Administrator, P.O. Box xxxx, City, ST xxxxx- xxxx.

## **THE SETTLEMENT BENEFITS**

### **1. What does the Settlement provide?**

If the Settlement is approved and becomes final, it will provide benefits to Settlement Class Members. Defendants will pay up to a total of \$550,000 to members of the Settlement Class that an award of attorneys' fees, costs, and expenses, plus a special service payment to the Class Representative who initiated the lawsuit (*see* Questions 5 and 27), in a total amount to be determined by the Court but not to exceed \$265,000 and the costs associated with administering the Settlement.

### **2. How much will my payment be?**

Each Class Member who submits a valid claim form is entitled to a cash payment from which the Settlement Administrator shall deduct any attorney fees and costs, service payment and cost of Notice and Administration approved by the Court.

### **3. When will I receive my payment?**

Settlement Class Members who submit valid claims will receive their payments by check issued by the Settlement Administrator, only after the Court grants final approval of the Settlement and after and appeals are resolved (*see* "The Final Approval Hearing" below). If there are appeals, resolving them can take time. Please be patient.

### **4. What am I giving up to stay in the Settlement Class?**

Unless you exclude yourself from the Settlement, you cannot sue, or bring a claim against Defendants about the issues in this case. Unless you exclude yourself, all of the decisions by the Court will bind you. The Settlement Agreement is available at [URL] and describes the claims that you give up if you remain in the Settlement.

## **HOW TO RECEIVE A PAYMENT**

### **1. How can I receive a payment?**

Upon the submission of a valid claim form, payments will be made by check issued by the Settlement Administrator.

### **2. How do I submit a claim?**

You can submit a claim online or by mail. You can view and print a paper claim form at [URL]. You can also request that a claim form be mailed to you by calling [XXX-XXX-XXXX], by emailing your request to the Settlement Administrator at [email address], or by writing to the Settlement Administrator *Humphrey v. Stored Value Cards* Settlement Administrator, P.O. Box xxxx, City, ST xxxxx-xxxx.

If you submit a claim, you also must provide information supporting your claim, including your name, mailing address, email address (if possible), telephone number, the name of the correctional facility you were incarcerated in and/or your release date. The Settlement Administrator may require you to provide additional information.

Claims must be postmarked or uploaded to the website no later than [claims deadline] and paper claims must be mailed to: *Humphrey v. Stored Value Cards* Settlement Administrator, P.O. Box xxxx, City, ST xxxxx-xxxx.

### **3. How will my claim be decided?**

After you submit your claim, the Settlement Administrator will analyze your claim to confirm whether you are entitled to a payment. If your application is incomplete or does not establish that you are entitled to a payment, the Settlement Administrator will notify you to correct any problems with your claim. If you do not respond by the date given by the Settlement Administrator, your claim will be denied.

The Settlement Agreement, available at [URL], provides more detail on how claims will be decided.

## **EXCLUDING YOURSELF FROM THE SETTLEMENT**

If you do not want benefits from the Settlement, and you want to keep the right to sue Defendants about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself. It is also sometimes called "opting out" of the Settlement Class.

1. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter or other written document by mail to the Settlement Administrator. Your request must include:

- Your name, address, telephone number, and account number;
- A statement that you want to be excluded from the settlement in *Humphrey v. Stored Value Cards*, No. 1:18-cv-1050 (N.D. Ohio); and
- Your signature.

You must mail your exclusion request, postmarked no later than [opt-out deadline], to *Humphrey v. Stored Value Cards* Settlement Administrator, P.O. Box xxxx, City, ST xxxxx-xxxx. You cannot ask to be excluded on the phone, by email, or at the website.

2. If I do not exclude myself, can I sue Defendants for the same thing later?

No. Unless you exclude yourself, you give up the right to sue or bring an arbitration against Defendants for the claims that the Settlement resolves. You must exclude yourself from the Settlement Class in order to try to maintain your own lawsuit or arbitration.

3. If I exclude myself, can I still get a payment?

No. You will not get a Settlement Payment if you exclude yourself from the Settlement.

**THE LAWYERS REPRESENTING THE SETTLEMENT CLASS**

1. Do I have a lawyer in the case?

The Court has appointed lawyers from the law firm O'Toole McLaughlin Dooley & Pecora, Co LPA. to represent all Settlement Class Members as "Settlement Class Counsel". They are:

Matthew A. Dooley  
Ryan M. Gembala  
Stephen M. Bosak, Jr.  
**O'Toole McLaughlin Dooley & Pecora Co LPA**  
5455Detroit Road  
Sheffield Village, Ohio 44054  
(440) 930-4001

You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

2. How will the lawyers be paid?

Class Counsel intend to request up to \$250,000 for attorneys' fees and reimbursement of the costs and expenses of prosecuting the class action. Class Counsel will also seek a special service award to be paid to the Class Representative in the amount of \$15,000. The fees and expenses awarded by the Court will be paid by out of the Settlement Funds. The Court will decide the amount to award.

**OBJECTING TO THE SETTLEMENT**

1. How do I tell the Court if I do not like the Settlement?

If you are a member of the Settlement Class, you can object to any part of the Settlement, the Settlement as a whole, Class Counsel's requests for fees and expenses, and/or the special service payment to the Class Representative. To object, you must submit a letter that includes the following:



- Your name, address, and telephone number;
- A statement saying that you object to the Settlement in *Humphrey v. Stored Value Cards*, No. 1:18-cv-1050 (N.D. Ohio);
- The reasons you object to the Settlement, along with any supporting materials; and
- Your signature.

You must mail your objection to the Clerk of Court for the Northern District of Ohio, Class Counsel, and Defense Counsel at the following address, and your objection must be postmarked by [objection deadline]:

United States District Court for Northern District of Ohio Attention: Clerk of Courts Carl B. Stokes U.S. Court House 801 West Superior Avenue Cleveland Ohio 44113	O'Toole McLaughlin Dooley & Pecora Co LPA Attention: Matthew A. Dooley 5455Detroit Road Sheffield Village, Ohio 44054	Fox Rothschild Attention: Eric J. Nystrom 2000 Campbell Mithun Tower 222 South Ninth Street Minneapolis, MN 55402
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2. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself. Excluding yourself is telling the Court that you do not want to be part of the Settlement. If you exclude yourself, you have no basis to object to the Settlement because it no longer affects you.

## THE FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to approve the Settlement and any requests for fees and expenses. You may attend and you may ask to speak, but you don't have to do so.

1. When and where will the Court decide whether to approve the Settlement?

The Court has scheduled a Final Approval Hearing on [date] at [time] at the United States District Court for Northern District of Ohio, located at Carl B. Stokes U.S. Court House, 801 West Superior Avenue, Cleveland Ohio 44113. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check the settlement website for updates. At this hearing the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider the request by Class Counsel for attorneys' fees, expenses, and a service payment to the Class Representative. If there are objections, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

2. Do I have to attend the hearing?

No. Settlement Class Counsel will answer questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you submitted your written objection on time, to the proper address, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

3. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must send a letter saying that you intend to appear and wish to be heard. Your Notice of Intention to Appear must include the following:

- Your name, address and telephone number;
- A statement that this is your " Notice of Intention to Appear " at the Final Approval Hearing for the Settlement in *Humphrey v. Stored Value Cards*, No. 1:18-cv-1050 (N.D. Ohio);



- The reasons you want to be heard;
- Copies of any papers, exhibits, or other evidence or information that you will present to the Court; and
- Your signature.

You must send copies of your Notice of Intention to Appear, postmarked by [date], to:

United States District Court for Northern District of Ohio  
Attention: Clerk of Courts  
Carl B. Stokes U.S. Court House  
801 West Superior Avenue

You cannot speak at the hearing if you exclude yourself from the Settlement.

### **GETTING MORE INFORMATION**

1. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. For a complete, definitive statement of the Settlement terms, refer to the Settlement Agreement at [URL]. You also may write with questions to the Settlement Administrator at *Humphrey v. Stored Value Cards* Settlement Administrator ,P.O. Box xxxx, City, ST xxxxx-xxxx or call the toll-free number, [XXX-XXX-XXXX], or contact Class Counsel.

*Humphrey v. Stored Value Cards Settlement Administrator*  
P.O. Box xxxx  
City, ST xxxxx-xxxx

«Barcode»

Postal Service: Please do not mark barcode

Claim#: JPK-«ClaimID»-«MailRec»

«First 1 » «Last 1 »

«CO »

«Addr2 »

«Addrl »

«City», «St» «Zip»

«Country»

### **CLAIM FORM**

PLEASE FILL OUT THIS CLAIM FORM IF YOU WOULD LIKE TO PARTICIPATE IN THE CLASS ACTION SETTLEMENT IN HUMPHREY V. STORED VALUE CARDS, NO. 1:18-CV-1050 (N.D. OHIO), AND RECEIVE A PAYMENT FOR FEES YOU PAID IN CONNECTION WITH YOUR NUMI PRE-PAID DEBIT CARD.

<i>Type or Print in the Boxes Below. Do NOT Use Red Ink, Pencil, or Staples.</i>		
<b>First Name</b>	<b>MI</b>	<b>Last Name</b>
<b>Mailing Address</b>		
<b>City</b>	<b>State</b>	<b>Zip</b>
<b>Tel (Day):</b>	<b>Tel (Eve):</b>	
<b>Email Address:</b>		
<b>From which correctional facility were you released?</b>		
<b>What was your date of release?</b>		

### **SIGNATURE AND CERTIFICATION UNDER PENALTY OF PERJURY**

I hereby declare under penalty of perjury that to the best of my knowledge and belief the information provided on this Claim Form is true and correct

**Signature:**

**Date (mm/dd/yyyy):**

Your Claim Form must be postmarked or filed online at [URL] no later than [date]. If you have any questions, please call [XXX-XXX-XXXX] or visit [URL].

COURT ORDERED NOTICE

*Amber Humphrey, On behalf of herself and  
all others similarly situated*

v.

*Stored Value Cards, Inc. d.b.a Numi  
Financial, et al.,*

Case: 1:18-cv-01050 (N.D. Ohio)

**If you paid fees on your  
pre-paid debit card issued  
by NUMI and Republic  
Bank, you may be eligible  
for a payment from a  
Class Action Settlement**

*(continued on Reverse Side)*

**Humphrey v. Stored Value Cards  
c/o Settlement Administrator  
PO Box 23369  
Jacksonville, FL 32241-3369**

PRESORT  
FIRST CLASS  
U.S. POSTAGE  
PAID

0 1 2 3 4 5 6 7 8 9 0 1 0 2 0 3 0 4

Postal Service: Please do not mark barcode

ID: <<noticeid>> - <<keyline>>

<<fname>> <<lname>>

<<addrline1>>

<<addrline2>>

<<addrcity>>. <<addrstate>> <<addrzip>>

A Settlement has been reached in a class action lawsuit about a pre-paid card program operated by NUMI and Republic Bank. ("Defendants") for inmates released from correctional facilities nationwide. Under the program, inmates have received the funds in their inmate trust accounts at the time of release on pre-paid debit cards issued by Defendants. The lawsuit, *Humphrey v. Stored Value Cards, Inc., et al.* is pending in the United States District Court for the Northern District of Ohio. The lawsuit challenges the placement of inmates' funds on the pre-paid debit cards and the fees Defendants charged for use of the cards. Defendants deny any liability or wrongdoing. However, to settle the case and avoid the costs and risks of litigation, Defendants have agreed to a settlement.

**Why am I being contacted?** Defendants' records show you are a member of the Settlement Class. The Settlement Class includes persons who reside in the United States and received a pre-paid debit card issued by Defendants upon release from a correctional facility.

**What are the Settlement terms?** Defendants have agreed to pay up to \$550,000 to members of the Settlement Class. Each Settlement Class member who submits a valid claim form is entitled to a cash payment from which the Settlement Administrator shall deduct any attorney fees and costs, service payment and cost of Notice and Administration approved by the Court.

**How do I get my Settlement Payment?** You will receive your Settlement Payment via check *after your submission of a valid claim form online or by requesting a form at the Settlement website, [URL].*

**How do I submit a Claim?** You can view and print a paper claim form at [URL]. You can also request a claim form by calling [XXX-XXX-XXXX], or by emailing [or](#) writing to the Settlement Administrator. You can submit a Claim online at [URL] or by mail. The deadline to submit a Claim is [claims deadline].

**Your rights may be affected.** If you do not exclude yourself from the Settlement, you will be bound by the terms of the Settlement Agreement, including its Releases. If you do not want to be legally bound by the Settlement, you must ask (in writing) to be excluded from the Settlement Class by [opt-out deadline]. If you stay in the Settlement Class, you may object to the Settlement by [objection deadline]. The Court has scheduled a hearing to consider whether to approve the Settlement and a request for attorneys' fees, costs, and expenses, plus a special service payment to the Class Representative who initiated the lawsuit, in a total amount not to exceed \$265,000. You can appear at the hearing, but you do not have to. You can hire your own attorney, at your own expense, to appear or speak for you at the hearing. You can call the toll-free number [XXX-XXX-XXXX] or visit the website at [URL] to learn more about how to exclude yourself from or object to the Settlement.

**When will the hearing be held to determine approval of the Settlement, and where?** The Court will hold the final fairness hearing on [date] at [time] at the United States District Court for Northern District of Ohio, located at Carl B. Stokes U.S. Court House, 801 West Superior Avenue, Cleveland Ohio 44113, to decide whether to approve: the Settlement, (2) Class Counsel's request for attorney's fees and expenses, and a service payment to the Class Representative, in a total amount of no more than \$ 265,000. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check the settlement website for updates.

**Who are the lawyers for the Class?** The Court has appointed O'Toole McLaughlin Dooley & Pecora, of Sheffield Village, Ohio, as Class Counsel.

**For more information:** [www.NUMICARSETTLEMENT.com]